

THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO

IN RE:

MELVIN HUMBERTO SANCHEZ OCASIO
NORMA BETHZAIDA SOSA ORTIZ

DEBTORS

CASE NO 16-06864-EAG

CHAPTER 13

**DEBTORS' MOTION REQUESTING ENTRY OF ORDER CONFIRMING
AMENDED PLAN DATED NOVEMBER 21, 2016 AND REQUEST TO SET
ASIDE CONFIRMATION HEARING SCHEDULED FOR JANUARY 18, 2017**

TO THE HONORABLE COURT:

**NOW COME, MELVIN HUMBERTO SANCHEZ OCASIO and NORMA BETHZAIDA
SOSA ORTIZ**, debtors in the above captioned case, through the undersigned attorney, and
very respectfully state and pray:

1. On November 21, 2016, the debtor filed an amended Plan, docket #20.
2. On December 5, 2016, the Chapter 13 Trustee filed a ***Recommendation for Confirmation: Recommends the plan*** (Plan dated November 21, 2016) docket #22.
3. The Fast-track Confirmation Hearing in this case was scheduled for November 18, 2016, however, the Order confirming the Plan was not entered on said date and the confirmation hearing was rescheduled for January 18, 2017, docket #19.
4. No objection has been filed, or if filed, has been withdrawn or otherwise disposed of, within fourteen (14) days from the date that the amended Plan, docket #20, was filed.
5. The debtors respectfully request to the Court to enter the Order confirming the amended Chapter 13 Plan and set aside the contested confirmation hearing scheduled for January 18, 2017, as pursuant to LBR. 3015-2(f).

Page -2-
Case No. 16-06864-EAG13
Debtor's Requesting Order Confirming Plan

WHEREFORE, debtors respectfully request this Honorable Court grant the present motion and order the confirmation of debtors' proposed amended Plan dated November 21, 2016, docket #20, and order that the confirmation hearing scheduled for January 18, 2017, be set aside, in the present case.

I CERTIFY that on this same date a copy of this notice was sent via electronically with the Clerk of the Court using CM/ECF systems which will send notifications of such to the Chapter 13 Trustee; and also certify that I have mailed by United States Postal Service copy of this motion to the debtors to their address of record.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 7th day of December, 2016.

/s/ Roberto A. Figueroa Colón
ROBERTO A. FIGUEROA COLON
USDC #300105
ATTORNEY FOR PETITIONERS

FIGUEROA & SERRANO, PSC
PO BOX 1635 GUAYNABO PR 00970
TEL. NO. (787) 744-7699
EMAIL: rfigueroa@fslawpr.com